

ORIGINAL

GREENBERG TRAURIG, LLP

James W. Perkins (JWP-6684)

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perkinsj@gtlaw.com*Attorneys for Plaintiffs*UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK-----
COMPAÑIA DEL BAJO CARONI (CAROMIN), C.A.,
Calle Cuenca, Manzana 7, Campo B de Ferrominera
Quinta Analú, Puerto Ordaz, Estado Bolívar Venezuela,
andV.M.C. MINING COMPANY, C.A.,
Calle Cuenca, Manzana 7, Campo B de Ferrominera
Quinta Analú, Puerto Ordaz, Estado Bolívar Venezuela,

Plaintiffs,

- against -

BOLIVARIAN REPUBLIC OF VENEZUELA,
c/o Consulate General of Venezuela
7 East 51st Street
New York, New York 10022, andMINISTRY OF BASIC INDUSTRIES AND MINES
c/o Consulate General of Venezuela
7 East 51st Street
New York, New York 10022,

Defendants.

X

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Civil Action No. 07 CV 3179 (NRB)

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**MOTION TO ADMIT
COUNSEL PRO HAC VICE**

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X

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for
the Southern and Eastern Districts of New York, I, James W. Perkins, Esq., a member in good
standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice*
of

RONALD W. KLEINMAN, ESQ.
Greenberg Traurig, LLP
800 Connecticut Avenue, N.W., Suite 500
Washington, D.C. 20006
Tel: (202) 331-3100
Fax: (202) 331-3101

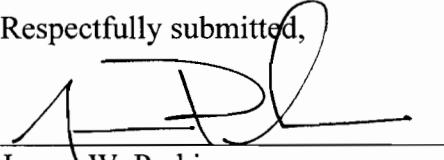
STEVEN M. SCHNEEBAUM, ESQ.
Greenberg Traurig, LLP
800 Connecticut Avenue, N.W., Suite 500
Washington, D.C. 20006
Tel: (202) 331-3100
Fax: (202) 331-3101

RONALD W. KLEINMAN, ESQ. AND STEVEN M. SCHNEEBAUM, ESQ. are members in good standing of the Bar of the State of Washington, D.C.

There are no pending disciplinary proceedings against RONALD W. KLEINMAN, ESQ. or STEVEN M. SCHNEEBAUM, ESQ. in any State or Federal court.

Dated: August 1, 2007
New York, New York

Respectfully submitted,



James W. Perkins
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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

COMPAÑIA DEL BAJO CARONI (CAROMIN), C.A.,
Calle Cuenca, Manzana 7, Campo B de Ferrominera
Quinta Analú, Puerto Ordaz, Estado Bolívar Venezuela,
and

V.M.C. MINING COMPANY, C.A.,
Calle Cuenca, Manzana 7, Campo B de Ferrominera
Quinta Analú, Puerto Ordaz, Estado Bolívar Venezuela,

Plaintiffs,

- against -

BOLIVARIAN REPUBLIC OF VENEZUELA,
c/o Consulate General of Venezuela
7 East 51st Street
New York, New York 10022, and

MINISTRY OF BASIC INDUSTRIES AND MINES
c/o Consulate General of Venezuela
7 East 51st Street
New York, New York 10022,

Defendants.

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

JAMES W. PERKINS, being duly sworn, deposes and says:

1. I am a Shareholder with the firm Greenberg Traurig, LLP, attorneys for Compañía Del Bajo Caroni (Caromin), C.A, and V.M.C. Mining Company, C.A. the Plaintiffs in this action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Ronald W. Kleinman, Esq., and Steven M. Schneebaum, Esq. as counsel *pro hac vice* to represent Plaintiff in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law on March 22, 1988. I am so admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Ronald W. Kleinman, Esq. since 1987.

4. I have known Steven M. Schneebaum, Esq. since 2006.

5. Mr. Kleinman is a Shareholder at Greenberg Traurig, LLP in Washington, D.C. and a member of the bar of the District of Columbia in good standing. I attach hereto as Exhibit A, a Certificate of Good Standing for Mr. Kleinman.

6. Mr. Schneebaum is a Shareholder at Greenberg Traurig, LLP in Washington, D.C. and a member of the bar of the District of Columbia in good standing. I attach hereto as Exhibit B, a Certificate of Good Standing for Mr. Schneebaum.

7. I have found both Mr. Kleinman and Mr. Schneebaum to be skilled attorneys and persons of integrity. Both are experienced in Federal practice and are familiar with the Federal Rules of Procedure.

8. Accordingly, I am pleased to move the admissions of Ronald W. Kleinman, Esq. and Steven M. Schneebaum, Esq., *pro hac vice*.

9. I respectfully submit a proposed order granting the admission of both Ronald W. Kleinman, Esq., and Steven M. Schneebaum, Esq., *pro hac vice*, which is attached hereto as Exhibit C.

WHEREFORE, it is respectfully requested that the motion to admit Ronald W. Kleinman, Esq. and Steven M. Schneebaum, Esq. *pro hac vice*, to represent Plaintiffs in the above captioned action, be granted.

Dated: August 1, 2007
New York, New York

Respectfully submitted,



James W. Perkins
SDNY Bar Code: (JWP-6684)

Sworn to before me this
1st day of August, 2007

Christy Schaeffer
Notary Public
CHRISTY SCHAEFFER
Notary Public, State of New York
No. 31-4769958
Qualified in New York County
Commission Expires August 31, 2010



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D.C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

RONALD WAYNE KLEINMAN

was on the 4TH day of APRIL, 1978

duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on July 26, 2007.

GARLAND PINKSTON, JR., CLERK

By: 
Deputy Clerk



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D.C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

STEVEN MARC SCHNEEBAUM

was on the 31ST day of MARCH, 1978

duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on July 26, 2007.

GARLAND PINKSTON, JR., CLERK

By: G. Jackson
Deputy Clerk

AFFIDAVIT OF SERVICE BY REGULAR MAIL

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

Civil Action No. 07 CV 3179 (NRB)

NATALIE ALCEE-SEEPERSAD, being duly sworn, deposes and says:

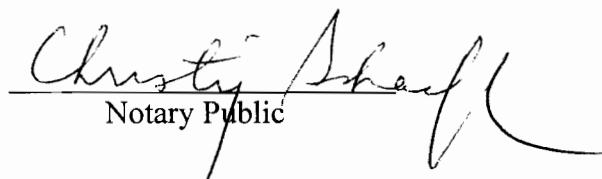
I am not a party to this action, I am over 18 years of age and reside in Queens, New York.

On August 1, 2007, I served the within MOTION TO ADMIT COUNSEL *PRO HAC VICE*, AFFIDAVIT OF JAMES W. PERKINS, ESQ., IN SUPPORT OF MOTION TO ADMIT COUNSEL OF *PRO HAC VICE* with the attached Exhibits A through C by depositing a true copy thereof enclosed in a post-paid wrapper, in an official depository under the exclusive care and custody of the United States Postal Service within New York State, addressed to:

Kenneth S. Leonetti, Esq.
FOLEY HOAG, LLP
1875 K Street, N.W.
Washington, D.C. 20006


NATALIE ALCEE-SEEPERSAD

Sworn to before me this
1st day of August, 2007


Christy Schaeffer
Notary Public

CHRISTY SCHAEFFER
Notary Public, State of New York
No. 31-4769958
Qualified in New York County
Commission Expires August 31, 2010